

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Lori R. Fife
Robert J. Lemons

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
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**SUPPLEMENT TO MOTION FOR AUTHORIZATION
TO REJECT CERTAIN EXECUTORY CONTRACTS**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

1. On September 7, 2010, Lehman Brothers Special Financing Inc. (“LBSF”), as debtor and debtor-in-possession (together with Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, the “Debtors” and, collectively with their non-debtor affiliates, “Lehman”), filed the *Motion for Authorization to Reject Certain Executory Contracts* (the “Motion”)¹ [Docket No. 11201].

2. As described in more detail therein, the Motion requests the entry of an order pursuant to section 365(a) of the Bankruptcy Code and Bankruptcy Rules 6006 and 9014 (i) authorizing LBSF’s rejection of the executory contracts listed on Exhibit A to the Motion,

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

including all transactions thereunder (the “Contracts”) and (ii) approving procedures for any claims that may be asserted the Debtors as a result of such rejection.

3. The Motion states that LBHI did not guarantee the obligations of LBSF under the Contracts. Based upon further review of the Debtors’ records, however, it may be the case that LBHI guaranteed LBSF’s obligations under some of the Contracts. The Debtors file this Supplement to make clear that the relief sought in the Motion is without prejudice to a Counterparty’s right to assert a claim against LBHI if such Counterparty believes that it has a valid and enforceable guarantee from LBHI of the payment obligations of LBSF under the Contract. Any such claims remain subject to objection by the Debtors or other parties in interest on any basis.

Dated: September 10, 2010
New York, New York

/s/ Robert J. Lemons

Lori R. Fife

Robert J. Lemons

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